

Exh. 1**Date:** 10/10/2019 5:48:35 PM**Subject:** RE: Ames, et al. v. St. Francois County Sheriff's Department, et al.**From:** "William Hellmich" <bill@hellmichhillretter.com>**Recipients:** vonne@semoelderlaw.com;**Attachments:**

1) HHR_914ea113-7aa5-45a2-9019-ee16ece78176.png

Let's discuss all this. You available for a call tomorrow?

William Hellmich

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From: Vonne Karraker <vonne@semoelderlaw.com>
Sent: Thursday, October 10, 2019 5:34 PM
To: William Hellmich <bill@hellmichhillretter.com>
Subject: Re: Ames, et al. v. St. Francois County Sheriff's Department, et al.

I apologize; I had depositions all day. Since we're stuck, I'm inclined to come in tomorrow and file pleadings informing the court that we can't agree on a neutral, submit both our suggested neutrals, and let the judge decide. I also intend to ask the court to modify the Scheduling Order since you don't have settlement authority for the current window of opportunity; there's really no point in attempting mediation without it.

Regards,
Vonne

Manley, Karraker & Karraker P.C.
110 S. Jefferson
Post Office Box 454
Farmington, Missouri 63640
(573) 756-6446 office
(573) 756-5151 facsimile

RE: Ames, et al. v. St. Francois County Sheriff's Department, et al.

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Original message

From: "William Hellmich" <bill@hellmichhillretter.com>
To: vonne@semoelderlaw.com;
Dated: 10/8/2019 11:34:40 AM
Subject: Re: Ames, et al. v. St. Francois County Sheriff's Department, et al.

We just can't seem to agree on anything. Let me think about this and get back to you.

William A. Hellmich

Sent from my iPhone.



William Hellmich

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On Oct 8, 2019, at 11:31 AM, Vonne Karraker <vonne@semoelderlaw.com> wrote:

I suggest we include a combined alphabetical list of both of our choices in the motion and ask the judge to choose from that list. I say this because Judge Cohen, according to the Eastern District's own list of mediators, has no experience in civil rights. I don't know if that is a preference of his or a simple fact, but the people I picked, by and large, specifically listed "civil rights" as one of their specialties.

Regards,
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Original message
From: "William Hellmich" <bill@hellmichhillretter.com>
To: vonne@semoelderlaw.com;
Dated: 10/8/2019 10:41:48 AM

Subject: RE: Ames, et al. v. St. Francois County Sheriff's Department, et al.

Vonne,

I am leaving the office for most (or perhaps all) of the day, but wanted to get back to you. I suggest that we file a simple Joint Request that the Court Appoint a mediator and recite that we have been unable to agree on one. I do not think we should list the mediators that each side desires and why. Let's just ask the Court to appoint one.

One other thing re: mediation. My insurer's Board does not meet until early or mid-December and the Board must approve any settlement. Assuming that we mediate before then, our negotiations will have to be "subject to Board approval". I have done this in the past and it has never been an issue, but I want to make you aware of that in case you prefer to have the mediation after our Board meeting (at which time I would have absolute authority).

Please let me know your thoughts on these two matters. Thanks.



William Hellmich

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From: Vonne Karraker
Sent: Tuesday, October 8, 2019 10:27 AM

To: William Hellmich

Cc: Michelle Stallings

Subject: RE: Ames, et al. v. St. Francois County Sheriff's Department, et al.

We already have a former judge on the proposed list. Should we ask the judge to weigh in on this?

Regards,

Vonne

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Original message

From: "William Hellmich" <bill@hellmichhillretter.com>

To: vonne@semoelderlaw.com;

Dated: 10/8/2019 9:32:25 AM

Subject: RE: Ames, et al. v. St. Francois County Sheriff's Department, et al.

How about former Judge Robert Cohen as a compromise? He is not my first or second choice, but I will agree to him.

William Hellmich



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From: Vonne Karraker
Sent: Tuesday, October 8, 2019 9:27 AM
To: William Hellmich
Cc: Michelle Stallings
Subject: RE: Ames, et al. v. St. Francois County Sheriff's Department, et al.

I felt comfortable with those choices; after all, the neutral list indicated that several of them had civil rights experience. I also checked with these individuals either directly or through their agencies, and specifically asked for those with experience in civil rights cases.

Regards,

Vonne

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Original message

From: "William Hellmich" <bill@hellmichhillretter.com>
To: vonne@semoelderlaw.com;
Dated: 10/8/2019 9:03:32 AM
Subject: RE: Ames, et al. v. St. Francois County Sheriff's Department, et al.

Well...we're not thrilled with your choices of mediators. None of them really have any civil rights experience.



William Hellmich

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From: Vonne Karraker

Sent: Tuesday, October 8, 2019 9:02 AM

To: vonne@semoelderlaw.com

Cc: William Hellmich ; Michelle Stallings

Subject: RE: Ames, et al. v. St. Francois County Sheriff's Department, et al.

Hello Bill and Michelle,

I was wondering if you have had a chance to look over the available dates for mediators that coincide with dates that I am available.

RE: William Ames v. St. Francois County Sheriff's department.

Thank you,

Susie Roth
Legal Assistant

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Original message

From: "Vonne Karraker" <vonne@semoelderlaw.com>
To: bill@hellmichhillretter.com;
Dated: 10/4/2019 2:22:42 PM
Subject: RE: Ames, et al. v. St. Francois County Sheriff's Department, et al.

Bill and Michelle, I don't know much about Weisenthal or Winters. I'd like to keep Judge Joan Burger on the list because of her experience and available dates. I'd be fine with considering Kenneth Chackes, Michael Geigerman, Kim Kirn or Melvin Kennedy. Geigerman would be my first choice, but he's pretty booked and the only day I could do it would be December 4.

Attached please find a list of each mediator's available dates that coincide with dates that I am currently available.

Thank you,
Vonne
sbr

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Original message

From: "William Hellmich"
To: vonne@semoelderlaw.com; michelle@hellmichhillretter.com;
Dated: 9/30/2019 11:03:52 AM
Subject: RE: Ames, et al. v. St. Francois County Sheriff's Department, et al.

I have no experience with any of those folks. How about Brad Winters or Ron Wiesenthal?

William Hellmich



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From: Vonne Karraker
Sent: Tuesday, September 24, 2019 2:04 PM
To: Michelle Stallings
Cc: William Hellmich

Subject: Ames, et al. v. St. Francois County Sheriff's Department, et al.

I'm glad somebody caught the typo. As for mediators, I'm thinking of Theodore MacDonald, Leonard Frankel, or Joan Burger. Do you have any thoughts in that area?

Regards,

Vonne K.

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